

PRIVILEGED & CONFIDENTIAL

ACCOUNTABILITY CERTIFICATION

File Owner

JOHN WHITMAN

File Custodian

JUDY CASELLA

I hereby certify as follows:

1. I am aware of and understand the Philip Morris policy regarding document retention and disposal, which is contained in the Records Management Manual as revised in June 1993.

2. In connection with the collection of documents by outside counsel for the ABC litigation, I have been provided a copy of the ABC Scope Statement, which describes the categories of documents to be collected. I have reviewed the Scope Statement.

3. I have been interviewed by SEAN OTERO, a member of the collection team, who explained the collection and the Scope Statement to me. I had the opportunity, during this interview, to discuss the nature of the files in my possession, and to ask questions regarding the Scope Statement and the collection.

4. I have reviewed my files and I have identified those that I believe are within the Scope Statement. During my review, members of the collection team were accessible to provide further guidance or to answer additional questions regarding the Scope Statement and the collection.

5. I understand that all documents, information, instructions, and data to be provided to me are strictly confidential and proprietary. I agree that I will not disclose, during the term of my employment or thereafter, to any third party, or in any way relate, distribute or disseminate to any third party, any documents, information, instructions, or data that I receive or learn during this collection process.

Date of Interview 8/12/94

Date(s) of file review 8/16/94

[Signature]
File Owner Signature

8/16/94
Date

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